



International Dairy Foods Association
Milk Industry Foundation
National Cheese Institute
International Ice Cream Association

June 2, 2003

Mr. Richard H. Mathews
Program Manager
National Organic Program
USDA-AMS-TMP-NOP
1400 Independence Ave., SW
Room 4008-So., Ag Stop 0268
Washington, DC 20250

*Submitted via the internet to:
National.List@usda.gov*

**Subject: Docket No. TM-03-02 National Organic Program; Proposed Amendments
to the National List of Allowed and Prohibited Substances**

Dear Mr. Mathews:

The International Dairy Foods Association (IDFA) appreciates the opportunity to provide the United States Department of Agriculture (USDA) National Organic Program (NOP) comments on the proposed rule to amend to the National List of Allowed and Prohibited Substances to add five substances to the NOP National List that identifies synthetic substances and ingredients allowed for use in or on processed products labeled as "organic" or "made with organic (specific ingredients or food group(s))" (7 CFR § 205.605). IDFA supports the proposed rule to include calcium sulfate, glucono delta-lactone, animal enzymes-(rennet-animals derived; catalase-bovine liver; animal lipase; pancreatin; pepsin; and trypsin), and cellulose in to the appropriate sections of the NOP National List for substances allow as ingredients in foods labeled as "organic" or "made

with organic ingredients," as these substances are essential in the manufacture of certain dairy foods. IDFA does not wish to comment on tetrasodium pyrophosphate as this compound is proposed for use only in textured meat analog products.

IDFA which represents the nation's dairy processing and manufacturing industries and their suppliers, is composed of three constituent organizations: the Milk Industry Foundation (MIF), the National Cheese Institute (NCI) and the International Ice Cream Association (IICA). Its 500-plus members range from large multinational corporations to single-plant operations, representing more than 85% of the volume of milk, cultured products, cheese, and ice cream and frozen desserts produced and marketed in the United States -- an estimated \$70-billion a year industry

IDFA believes that four substances listed below are necessary to the production and handling of organic foods dairy foods and the production and use of these compounds meet the requirements set forth by the Organic Foods Production Act (OFPA) of 1990. Listed below are the justifications for including these compounds as an approved substance in the NOP's National List of Approved and Prohibited Substance:

Calcium sulfate-mined:

Calcium sulfate, also know as anhydrate and gypsum, occurs naturally and exists as a fine white powder. It is used by the dairy processing industry as a color or color adjunct. It is approved by the Federal Food and Drug Administration (FDA) for the use in Asiago, Caiocavallo Siciliano, Gorgonzola, Parmesan, Provolone, Romano, Swill and Emmmental cheese. Calcium sulfate is used to bleach naturally milk during the cheese making process in place of adding artificial white colorant directly to the cheese.

Glucono delta-lactone

Glucono delta-lactone is prepared by crystallization of gluconic acid. Gluconic acid may be produced by the oxidation of *D*-glucose with bromine water, or by the oxidation of *D*-glucose by microorganisms. Glucono delta-lactone is used as a direct acidification agent for manufacture of acidified milk or cottage cheese curd. Glucono delta-lactone is added to milk to lower the pH to 4.5-4.8 until coagulation of the milk proteins occur by direct acidification. Lower the pH of milk is a necessary step to produce the thickened texture and flavor of acidified milk or the curd formation of the cottage cheese.

Animal enzymes-(rennet-animals derived; catalase-bovine liver; animal lipase; pancreatin; pepsin; and trypsin)

Rennet is a naturally occurring aqueous extract prepared from cleaned, frozen, salted, or dried fourth stomachs (abomasa) of calves, kids, or lambs. Rennet is a necessary enzyme for the clotting action of milk to manufacture cheese curd for all types of cheese.

However IDFA questions why the proposed addition for animal enzyme is listed in the § 205.604 (b) synthetics allowed rather than § 205.604 (a) non synthetics allowed, since

animal enzymes are naturally occurring extracts rather than synthetically derived compounds.

Cellulose

Cellulose powders are used the in dairy industry primarily as a processing aid to prevent anticaking and clumping of grated and shredded cheeses.

IDFA appreciates the opportunity to comment on the USDA's amendments to the NOP National List of allowed substances for organic foods and would welcome the opportunity to discuss these issues. We are also glad to answer questions or provide additional information.

Respectfully submitted,

Cary Frye
Vice President, Regulatory Affairs

Cc: E. Linwood Tipton, President and CEO, IDFA
Greg Frazier, Senior Vice President, IDFA